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August 25, 2023

**Via CM/ECF**

Hon. Lorna G. Schofield  
United States District Court for the Southern District of New York  
Daniel Patrick Moynihan Courthouse  
500 Pearl Street, New York, NY 10007

Re: Case No. 20-cv-4322, *King v. Habib Bank Limited*, Letter Requesting Approval of Redacted Filing

Dear Judge Schofield:

Pursuant to Individual Rule I.D.3, the Electronic Case Filing Rules & Instructions § 6, and the parties' Stipulated Protective Order (Dkt. 75) ¶ 14, Plaintiffs seek approval to redact information from Plaintiffs' August 25, 2023, Opposition to Defendant Habib Bank Limited's Motion for Reconsideration Based on *Twitter* and *Freeman*, filed pursuant to this Court's August 9, 2023, Order (Dkt. 162). Plaintiffs' Opposition references documents that Defendant Habib Bank Limited ("HBL") produced in this case and designated as "Confidential" pursuant to the parties' Stipulated Protective Order and that Magistrate Judge Wang has previously held may be filed under seal (Dkts. 102, 119, 133). Specifically, the redacted materials relate to HBL customers' banking records and customer transactions that have previously been referenced under seal in, e.g., Dkts. 108 and 128. Plaintiffs are contemporaneously filing with this letter: (1) a public version of Plaintiffs' Opposition with the proposed redactions, and (2) an under-seal version of Plaintiffs' Opposition with the proposed redactions highlighted.

Sincerely,

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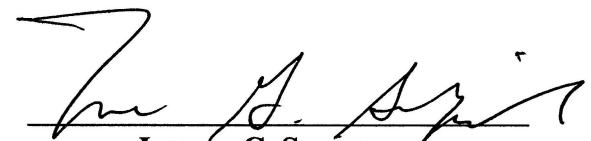
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"The common law right of public access to judicial documents is firmly rooted in our nation's history," this right is not absolute and courts "must balance competing considerations against" the presumption of access. *Lugosch v. Pyramid Co. of Onondaga*, 435 F.3d 110, 119-20 (2d Cir. 2006) (internal quotation marks omitted); see also *Nixon v. Warner Commc'ns., Inc.*, 435 U.S. 589, 599 (1978) ("[T]he decision as to access is one best left to the sound discretion of the trial court, a discretion to be exercised in light of the relevant facts and circumstances of the particular case."). While the parties' confidentiality stipulations are not dispositive to the question of whether documents may be filed under seal, the information that Plaintiffs seek to redact is the type of sensitive financial information that Courts in this district "routinely permit parties to seal or redact." *Armouth Int'l, Inc. v. Fallas*, No. 19 Civ. 3669, 2023 WL 2975154, at \*1 (S.D.N.Y. Mar. 31, 2023).

Plaintiffs' motion to seal the document at Dkt. No. 166 is GRANTED. The Clerk of Court is respectfully directed to maintain Dkt. 166 under seal and to close the motion at Dkt. 165.

Dated: November 28, 2023  
New York, New York



**LORNA G. SCHOFIELD**  
**UNITED STATES DISTRICT JUDGE**